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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

59682-1

Controlled Release Technologies, Inc 18167 US Highway 19 North Suite 270 Clearwater, FL 34624

Attention: Olivia Laird, Agent Lynn Burkhart, Jr. President/Owner

Subject: Panguard HC EPA Registration No. 59682-1 Your Submission Dated April 27, 1995

The Agency has completed it review of the submission submitted above and the review comments are outlined below.

1. Confidential Statement of Formula: This form is incorrectly filled out. Submit a revised CSF for our review which incorporates the following revisions.

a. Block # 15 must be filled in for all ingredients.

b. The two quaternaries must not be separated. Enter onto the CSF only the BTC 2125M. NOTE: The instructions in Block # 10 state: "...List as actually introduced into the formulation..." The quats are not added separately. They are added together at the same time.

c. Delete the confusing reference "...biocidal solution composed of BTC 2125 M & Standamid KD..."

d. The certified limits for BTC 2121M would be 33.6% and 30.4 respectively. (upper and lower limits: Blocks 14a & 14b).

e. Just a reminder to redate and resign the CSF which incorporates the above revisions.

2. The polymer information has been added to the file.

3. The information submitted in reference to the fragrance is acceptable and will be permitted to be used in this formulation at this time.

CONCURRENCES									
SYMBOL									
DATE									
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4. The final labels submitted in response to the Registration Notice are unaccepatable. A cursory review of these labels indicates that none of the label revisions requested in the Registratrion Notice were included in the submitted final labels. It is your responsibility to submit final labels which reflect all the revisions as outlined in the Registration Notice. A marked copy of the submitted label is enclosed for your review.

5. The amendment (product name change), submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the following labeling changes below before you release the product for shipment bearing the amended labeling.

a. The container disposal heading and the appropriate container statments must be declared on the label.

b. Delete only the word: "the" which appears in the heading: KEEP OUT OF REACH OF CHILDREN.

c. Revise "...Wash thoroughly with soapy water after handling..." to read: Wash thoroughly with soap and water after handling.

d. Delete the words: "Professional" and "trained service personnel".

NOTE: These words will be confused with required statements for restricted use pesticides which permit sale to and use only by certified applicators. Because of the risks posed by restricted use pesticides, the agency believes it is important that the distinction between restricted use and unrestricted pesticides remains always clear to retailers, purchasers and applicators.

6. Our records have been adjusted to reflect your product name change:

OLD PRODUCT NAME: Panguard HC

NEW PRODUCT NAME: Microgu*rd HC

7. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, contact V. Goncarovs at 703-305-6663.

Sincerely,

Marion Johnson Product Manager (31)								
CONCURRENCES MICRODial Program Branch								
SYMBOL	Registration Division (H75050)							
SURNAME								
DATE								

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"The Professional's Choice" sm

Eliminates Overflows
 Broad Spectrum Anti-Microbial

Continuously Cleans
 Lasts For Six Months

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

For use in drain pans of cooling equipment: air conditioners, refrigerators, coolers, and ice machines.

Not for use in heat vaporizing or atomizing type vaporizer humidifiers Installation Instructions: Remove from plastic bag. KEEP KNIT ENCLOSURE IN TACT. Place on the surface of the pan, as close to the cooling coil as possible. Install away from the drain out flow.

For use only by trained service personnel for application in medical, government, commercial, airport, resort, schools, food processing, and industrial areas.



Condensate Drip Pan Micro-Biocide

for commerical and industrial use.

Active ingredients

Akyi (00% C14, 30% C16, 5% C14, 5% C12) 0mem	n i
benzyl ommonium chioride	16.0%
Alky (68% C12, 32% C14) dimentity eltrybenzy	
omnonium chloride	
inert ingrectionis:	

KEEP OUT OF THE REACH OF CHILDREN

DANGER

See side panel for additional precautionary statements. THIS CARTON CONTAINS

Gross Count:

Stock No.:

Net Content:

EPA REGISTRATION NO, 59682-1 EPA EST NO, 59682-FL-001 Monufacti Controlled R 18167 Clearwo

PRECAUTION HAZARDS TO HUMAN

DANGER. CORROSIVE: C Harmful of fatal if swallower clothing. To protect skin, w Wash thoroughly with soap

STATEMENT OF PRACTIC

If in eyes, flush with plenty of If on skin, wash with plenty of If swallowed, promptly drint Avoid alcohol. Get med Note to physician: Probab contraindicate the use of g

STORAGE AND DISPOSA food, or feed by storage or moisture.

PESTICIDE DISPOSAL: P hazardous, improper dispo mixture or insole is a violat cannot be disposed of by contact your State Pesticid or the nearest EPA office fo

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- ACCEPTED WILL COMMENTS IN LEAST LEASE

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